

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CASE NO. 3:17-cv-05806-RJB

UGOCHUKWU GOODLUCK
NWAUZOR, individually and on behalf
of all those similarly situated, and
FERNANDO AGUIRRE-URBINA,
individually,

Plaintiffs,

v.

THE GEO GROUP, INC.,

Defendant.

CASE NO. 3:17-cv-05769-RJB

**EXHIBIT LIST OF JURY
TRIAL**

EXHIBIT LIST - 1

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
321	5/30/14 Detainee Kite requesting to work	6/2/2021	
309	10/22/2015 Pod Porters Roster	6/2/2021	
229	VWP Agreement	6/2/2021	
080	Daily Detainee Worker Pay Sheet – Blank & G-4 Pod Roster for 6/14/17	6/2/2021	
115	12/07/2009 Batch Summary	6/2/2021	
082	3/1/2010 Email from Alisha Singleton to Shihpei Stevenson	6/2/2021	
103	Refusal to Work Form	6/2/2021	
069	06/14/2011 Department Head Meeting Minutes	6/2/2021	
078	5/1/2012 Department Head Meeting Notes	6/2/2021	
014	4/12/2012 Memorandum from Classification to Associate Warden McHatton	6/2/2021	
131	Welcome Book ACA Audit – September 25-27, 2017	6/2/2021	
123	NWDC Detainee Handbook – 8/1/16	6/2/2021	
244	Photograph of laundry with detainee emptying drier	6/2/2021	
329	House Unit Photograph	6/2/2021	
522	Photographs of the detainee living areas	6/2/2021	
297	House Unit Photograph	6/2/2021	
521	Photographs of the detainee living areas	6/2/2021	
430	Kitchen Photograph	6/2/2021	
002	GEO NWDC Policy and Procedure Manual- 5.1.2 Voluntary Work Program. Effective: 4/13/2015.	6/2/2021	

EXHIBIT LIST - 2

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
083	Job Description- Cook/Prep/Server	6/2/2021	
084	Job Description- Dishwasher	6/2/2021	
085	Job Description – Laundry Worker	6/2/2021	
088	Job Description – Barber	6/2/2021	
089	Job Description – Barber Cleaner	6/2/2021	
091	Job Description – Pod Porter	6/2/2021	
017	PBNDS 2011 – 5.8 Voluntary Work Program	6/2/2021	
132	September 1, 2015 Department Head Meeting Minutes	6/2/2021	
127	Complete Copy of 2011 PBNDS, as revised	6/2/2021	
141	Post Order: Laundry Officer, Effective Date: 4/5/2016	6/2/2021	
137	GEO NWDC Policy and Procedure Manual 3.3.1: Infractions and Disciplinary Sanctions	6/2/2021	
129	2015 contract between Immigration and Customs Enforcement (ICE) and GEO, No. HSCEDM-15-D-00015 in effect September 28, 2015	6/2/2021	
146	8/24/2011 Memorandum from Heather West to Mike Ruckstuhl	6/2/2021	
364	8/30/2014 Email from Bill McHatton to Lowell Clark	6/2/2021	
233	Photograph of hallway outside of laundry with detainee and 3 GEO employees	6/2/2021	
197	GEO NWDC Policy 5.1.2, effective 4/18/14	6/3/2021	
A-282	Policy and Procedure Manual 5.1.2 with Signatures	6/3/2021	

EXHIBIT LIST - 3

1	NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
2	442	Kitchen Photograph	6/3/2021	
3	445	Kitchen Photograph	6/3/2021	
4	433	Kitchen Photograph	6/3/2021	
5	447	Kitchen Photograph	6/3/2021	
6	527	Kitchen Photograph	6/3/2021	
7	049	Photograph of Detainee Workers in the Kitchen	6/3/2021	
8	439	Kitchen Photograph	6/3/2021	
9	434	Kitchen Photograph	6/3/2021	
10	352	Kitchen Photograph	6/3/2021	
11	353	Kitchen Photograph	6/3/2021	
12	438	Kitchen Photograph	6/3/2021	
13	459	Kitchen Photograph	6/3/2021	
14	440	Kitchen Photograph	6/3/2021	
15	456	Kitchen Photograph	6/3/2021	
16	005	Kitchen Worker Orientation Packet	6/3/2021	
17	051	5/31/2010 Outcount Sheet Lunch Pay Sheet	6/3/2021	
18	037	GEO Group's Standards Compliance Checklist	6/3/2021	
19	027	GEO Corporate Policy and Procedure Manual - 4.3.1: Food Service Management Procedure, Effective 4/18/14	6/3/2021	
20	035	2013 NWDC Year End Report	6/4/2021	
21	057	5/9/2013 Daily Detainee Worker Pay Sheets	6/4/2021	
22	300	Internal/External Job Posting – Food Service Supervisor NWDC	6/4/2021	
	303	Food Service Department - Food Cost Summary	6/4/2021	
	306	Detainee/Staff Health and Hygiene	6/4/2021	
	234	Photograph of bins with laundry in the hallway outside of the laundry	6/4/2021	

EXHIBIT LIST - 4

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
435	Kitchen Photograph	6/4/2021	
607	Detainee Kite #2,193,425 Sent to ICE 9/30/17, Received by ICE and closed 10/3/17.	6/4/2021	
A-286	Orlando Marquez-Zavalsa VWP Documents–Signed Voluntary Work Form 04/25/17 (In Spanish)	6/4/2021	
A-289	Orlando Marquez-Zavalsa VWP Documents–Refusal to Work Form 06/16/17	6/4/2021	
A-287	Orlando Marquez-Zavalsa VWP Documents – VWP Request to Work 05/31/17	6/4/2021	
408A	Daily Detainee Worker Pay Sheet for 7/22/17 for Pod G3	6/4/2021	
216	Barbershop Photograph	6/7/2021	
A-296	Karla Gomez-Soto (Maria Nayra Gomez Sotelo) VWP Documents–VWP Agreement 04/23/18	6/7/2021	
A-297	Karla Gomez-Soto (Maria Nayra Gomez Sotelo) VWP Documents–VWP Request to Work 05/02/18	6/7/2021	
A-298	Karla Gomez-Soto (Maria Nayra Gomez Sotelo) VWP Documents–Refusal to Work Form 06/05/18	6/7/2021	
A-299	Karla Gomez-Soto (Maria Nayra Gomez Sotelo) VWP Documents–VWP Agreement 10/04/18	6/7/2021	
A-300	Karla Gomez-Soto (Maria Nayra Gomez Sotelo) VWP Documents–Detainee Job Description for Laundry Worker 10/04/18	6/7/2021	

EXHIBIT LIST - 5

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
341	Declaration of former detainee Karla Gomez Soto (Maria Nayra Gomez Sotelo) in Spanish	6/7/2021	
342	Certified translation of declaration of Karla Gomez Soto (Maria Nayra Gomez Sotelo) in English	6/7/2021	
491	Grey Mile Photograph	6/7/2021	
474	Grey Mile Photograph	6/7/2021	
490	Grey Mile Photograph	6/7/2021	
020	Chart of Hours Worked and Number of Workers	6/7/2021	
A-219	Photographs	6/8/2021	
A-281	Northwest Mural	6/8/2021	
036	2014 NWDC Year End Report	6/8/2021	
598	House Unit Photograph	6/8/2021	
347	Commission on Accreditation for Corrections Standards Compliance Reaccreditations Audit	6/8/2021	
175	1/2/2017 Batch Summary	6/8/2021	
534	Payroll Transactions 8/1/2017-9/1/2017	6/8/2021	
180	Invoice to ICE November 2016	6/8/2021	
260	9/2/2015 Email from Ryan Kimble to Chuck Hill	6/8/2021	
194	2014 Budget Western Region Overview – Slideshow	6/8/2021	
253	Consolidated Financial Statement for 2005 through 2018 for Northwest Detention Center with writing	6/8/2021	
184	8/25/2015 Email from Matt DenAdel to Amber Martin with attached Final GEO Ex. D Tacoma 1101 Bed Guarantee 082575.xls pricing workbook	6/9/2021	

EXHIBIT LIST - 6

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
269	GEO NWDC Detainee Work Reimbursement from ICE	6/9/2021	
262	Northwest ICE Processing Center Facility Financial Summaries	6/9/2021	
365A	May 30, 2018 Letter from GEO CEO to Peter Edge	6/9/2021	
608	Map of Nigeria	6/9/2021	Illustrative only
A-303	Nwauzor VWP Documents – VWP Agreement 11/10/16	6/9/2021	
609	Agreed Facts	6/10/2021	
A-023	GEO's Contract with the Washington Department of Corrections (May 2015)	6/10/2021	
A-025	Correctional Industries Class II Employment (2014)	6/10/2021	
A-031	Correctio3al Industries Class III Employment (2008)	6/10/2021	
A-054	Correctional Industries Annual Report (2017)	6/10/2021	
A-055	About Washington State Correctional Industries	6/10/2021	
A-044	Washington DOC Food Services Program	6/10/2021	
A-014	Special Commitment Center Residential Vocational Program Policy	6/11/2021	
A-308	Minimum Wage Act Applicability Policy ES.A.1, Chapter RCW 49.46, Rev. 07/15/14	6/11/2021	
A-321	Minimum Wage Act Applicability Policy ES.A.1, Chapter RCW 49.46, Rev. 12/29/20	6/14/2021	

EXHIBIT LIST - 7